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COUNTY OF CLARK, CAROLE FALCONE
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SUSAN HOY as Special Administrator of the
ESTATE OF A.D.J., a male minor (November
17, 2003 – April 25, 2017), and SUSAN HOY as
Guardian Ad Litem of A.B.J., a female minor,
(December 21, 2005), DIJONAY THOMAS,
individually and as heir to A.D.J.,

Plaintiffs,

v.

PAUL D. JONES, individually; CAROLE
FALCONE, individually and in her official
capacity; PAULA HAMMACK, individually and
in her official capacity; COUNTY OF CLARK, a
political subdivision of the State of Nevada;
DOES I-X, individuals; and ROE
CORPORATIONS I-X; DOE CLARK COUNTY
DEPARTMENT OF FAMILY SERVICES
EMPLOYEES XI-XXX; individually and in their
official capacities; BOULDER II DE, LLC, a
Delaware Limited Liability Company dba
SIEGEL SUITES BOULDER 2; THE SIEGEL
GROUP NEVADA, INC., A Domestic
Corporation, dba THE SIEGEL GROUP;
BOULDER II LV HOLDINGS, LLC, A Nevada
Limited Liability Company; DOE EMPLOYEE
SIEGEL SUITES I-X,

Defendants.

CASE NO. 2:18-CV-01403-RFB-EJY

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME FOR
DEFENDANTS' TO FILE REPLIES
TO PLAINTIFFS' RESPONSES (ECF
Nos. 122 and 123) AND RESPONSE
TO PLAINTIFFS' ERRATA (ECF No.
124)**

(FIRST REQUEST)

COME NOW Plaintiff SUSAN HOY as Special Administrator of the ESTATE OF A.D.J., a male minor 17, 2003 - April 25, 2017), and SUSAN HOY as Guardian Ad Litem of A.B.J., a female minor, (December 21, 2005), DIJONAY THOMAS, individually and as heir to A.D.J.; and Defendants CAROLE FALCONE, individually and in her official capacity; PAULA HAMMACK, individually and in her official capacity; COUNTY OF CLARK, a political subdivision of the State of Nevada (collectively "Defendants"); by and through their respective counsel of record and hereby stipulate to extend the time for Defendants to file their Reply to Plaintiffs' Response to Counter-Motion to Strike (ECF No. 122); Reply to Plaintiffs' Response to in support of Counter-Motion for Sanctions (ECF No. 123); and Response to Plaintiffs' Errata to Motion to Amend (ECF No. 124).

Defendants' Replies are currently due on June 25, 2021. On June 18, 2021, after Defendants' filed their Response to Plaintiff's Motion to Amend and Counter-Motions to Strike and for Sanctions on June 8 and 9, 2021 (ECF Nos. 107, 115 and 116), Plaintiffs filed an Errata to their Motion Amend, including the 27-page proposed second amended Complaint. (ECF No. 124) Defendants' counsel will be out of State between June 23 and June 26, 2021 due to family medical issues and will not be able to timely prepare the Replies and prepare the Response to the Errata, including given the 47 pages of documents. Therefore, Defendants have good cause to request an extension of time until July 5, 2021, ten (10) days after the Replies would otherwise be due and to prepare the Response to the Errata.

Defendants' Replies to Plaintiffs' Responses (ECF Nos. 122 and 123) and the Response to Errata will be due on July 5, 2021.

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This is Defendants' first request for an extension and this stipulation is submitted in good faith without the purpose of undue delay.

DATED this 22nd day of June, 2021.

H&P LAW

/s/Marjorie Hauf, Esq.

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DATED this 22nd day of June, 2021.

**OLSON CANNON GORMLEY
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/s/Felicia Galati, Esq.

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IT IS SO ORDERED this 22nd day of June, 2021.



RICHARD E. BOULWARE, II
United States District Court

Susan Hoy, et al v. Paul Jones, et al
Case No. 2:18-CV-01403-RFB-EJY